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*Special Counsel for Lehman Brothers Holdings Inc.  
and Certain of Its Affiliates*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: Case No. 08-13555 (SCC)
	:
Debtors.	: (Jointly Administered)
-----X	

**CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746 REGARDING  
FOUR HUNDRED SEVENTY-FIRST OMNIBUS OBJECTION TO CLAIMS (NO  
LIABILITY CLAIMS) SCHEDULED FOR HEARING ON JULY 16, 2014**

TO THE HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures entered on June 17, 2010 [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc. ("LBHI"), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for the entities in the above-referenced chapter 11 cases, filed the following omnibus claims objection (the "Claims Objection") with the Court for hearing on July 16, 2014:

- a. Four Hundred Seventy-First Omnibus Objection to Claims (No Liability Claims) [ECF No. 44491].

2. In accordance with the Second Amended Case Management Order, LBHI established a deadline of July 2, 2014 at 4:00 p.m. (the “Response Deadline”) for the Claims Objection for parties to object or file responses. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadline has now passed and, to the best of my knowledge, no responsive pleadings to the Claims Objection have been (a) filed with the Court on the docket of the above-reference chapter 11 cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on LBHI’s counsel by any of the holders of the claims included in Exhibit 1 to the Order attached hereto, which includes only the proofs of claim for which the Claims Objection will be granted.

4. Accordingly, LBHI respectfully requests that the proposed order granting the Claims Objection annexed hereto as Exhibit A, which is unmodified since the filing of the Claims Objection, be entered in accordance with the procedures described in the Second Amended Case Management Order.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
July 3, 2014

/s/ Adam M. Bialek

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**EXHIBIT A**

**(Proposed Order – ECF No. 44491)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re** : **Chapter 11**  
 :  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **Case No. 08-13555 (SCC)**  
 :  
**Debtors.** : **(Jointly Administered)**  
-----X

**ORDER GRANTING FOUR HUNDRED SEVENTY-FIRST  
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Upon the four hundred seventy-first omnibus objection to claims, dated June 2, 2014 (the “Four Hundred Seventy-First Omnibus Objection to Claims”),<sup>1</sup> of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, seeking to disallow and expunge the No Liability Claims pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], all as more fully described in the Four Hundred Seventy-First Omnibus Objection to Claims; and due and proper notice of the Four Hundred Seventy-First Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Seventy-First Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Four Hundred Seventy-First Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Seventy-First Omnibus Objection to Claims.

ORDERED that the relief requested in the Four Hundred Seventy-First Omnibus Objection to Claims is granted; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the No Liability Claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2014  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

# **EXHIBIT 1**

OMNIBUS OBJECTION 47: EXHIBIT 1 - NO LIABILITY

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
1 BANK OF AMERICA MERRILL LYNCH INTERNATIONAL LTD.	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/22/2009	27850	\$2,734,385.61	\$2,734,385.61 *	None
2 BANK OF AMERICA MERRILL LYNCH INTERNATIONAL LTD.	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/22/2009	27854	\$4,750,000.00	\$4,750,000.00 *	None
TOTAL					\$7,484,385.61	\$7,484,385.61	